

US EPA ARCHIVE DOCUMENT

NOTE

Subject: EPA Comments on Dayton Power and Light Company – Killen Electric
Generating Station, Manchester, Ohio
Round 10 Draft Assessment Report

To: File

Date: April 19, 2012

1. On p. 14, 2.1.3.2 Crest, "The crest of the Bottom Ash Pond has a gravel cover that serves as an access road around the entire perimeter of the pond." This section is should be discussing the fly ash pond, not the Bottom Ash Pond.
2. On p. 15, 2.1.3.3 Interior of Embankment, "As of December 31, 2008 DP&L reported that approximately 4,144,298 tons of material was stored in the Bottom Ash Pond, which has an estimated capacity of 21,566,007 tons." This section is should be discussing the fly ash pond, not the Bottom Ash Pond.
3. We have requested that the following question be answered for each pond, this is generally accompanied with the assessment check list sheets: "*Is any part of the impoundment built over wet ash, slag, or other unsuitable materials (like TVA)?*" Please address for each impoundment.



June 27, 2012

Killen Electric Generating Station
Tel 937-549-3911

Mr. Stephen Hoffman
U.S. Environmental Protection Agency
Two Potomac Yard
2733 South Crystal Drive
5th Floor, N-5237
Arlington, VA 22202-2733

Dear Mr. Hoffman:

On May 29, 2012, The Dayton Power and Light Company (DP&L) received via email the draft report related to the site assessment of the coal combustion residual impoundments at the Killen Electric Generating Station. The site assessment was conducted on June 7, 2011 by U.S. EPA's engineering contractor, GZA GeoEnvironmental, Inc. The note accompanying the draft report requests that comments on the draft report be submitted to USEPA within 30 days of receipt and provides for a business confidentiality claim covering all or part of the information.

COMMENTS ON THE DRAFT REPORT

Comments on Section 1.0 – Description of Project

1. Page 4, Section 1.2.4 – the sixth paragraph of the section discusses Ditch A and Ditch B and refers the reader to Figures 3 and 4 for their approximate locations. It appears that neither Ditch A nor Ditch B is identified on Figure 3.
2. Page 4, Section 1.2.4 – the seventh paragraph of the section discusses two survey monuments (SM2 and SM3) and two piezometers (W-1 and W-2) associated with the bottom ash pond and refers the reader to Figures 3 and 4 for the locations of the survey monuments and piezometers. It appears that neither the survey monuments nor the piezometers associated with the bottom ash pond are included on Figures 3 or 4.
3. Page 5, Section 1.2.5 – the fifth paragraph of the section discusses Ditch A and Ditch B and refers the reader to Figures 3 and 4 for their approximate locations. It appears that neither Ditch A nor Ditch B is identified on Figure 3.
4. Page 5, Section 1.2.5 – the sixth paragraph of the section discusses eight survey monuments (SM1 and SM4 through SM10) and six piezometers (W-3 through W-8) associated with the fly ash pond and refers the reader to Figures 3 and 4 for the locations of the survey monuments and piezometers. It appears that survey monuments SM1, SM4

and SM5 are not included on Figures 3 or 4. It also appears that the piezometers associated with the fly ash pond are not included on Figures 3 or 4.

5. Page 5, Section 1.2.5 – it appears the last two sentences of the sixth paragraph are repetitive.
6. Page 5, Section 1.2.6 – the second paragraph includes the sentence “Operation and maintenance of the Bottom Ash Pond is regulated by the EPA, ODNR and the OEPA (NPDES permit).” DP&L agrees that the bottom ash pond is regulated by ODNR through its dam safety program and OEPA as a component of the station’s waste water treatment system the discharge from which is regulation through the ND PES program. However DP&L is not aware of any federal/USEPA regulatory program for ash ponds other than oversight of delegated states’ NPDES permitting program. DP&L suggests that “EPA” be removed from this sentence.
7. Page 6, Section 1.2.6 – in the third bullet, the word “crack” should be “cracks”.
8. Page 7, Section 1.2.7 – the first paragraph includes the sentence “Operations and maintenance of the Fly Ash Pond is regulated by the EPA and the OEPA under the same NPDES permit as the Bottom Ash Pond.” DP&L agrees that the bottom ash pond is regulated by OEPA as a component of the station’s waste water treatment system the discharge from which is regulation through the ND PES program. However DP&L is not aware of any federal/USEPA regulatory program for ash ponds other than oversight of delegated states’ NPDES permitting program. DP&L suggests that “EPA” be removed from this sentence. In addition, DP&L suggests that ODNR be included in this sentence since ODNR regulates the ash pond through its dam safety program.
9. Page 11, Section 1.3.9 – in the third observation/recommendation, “T: drain” should be “T drain”.
10. Page 14, Section 2.1.3 – the header for the section “Fly Ash Pond (Photos 11 through 21, 23, 24, 25, 27, 28)” should be “Fly Ash Pond (Photos 11, 13 through 21, 23 through 28)”. Photo 12 was taken from the Bottom Ash Pond and Photo 26 is related to the Fly Ash Pond.
11. Page 14, Section 2.1.3.1 – the header for the section should not include Photo 22 since that photo was taken from the Bottom Ash Pond.
12. Page 14, Section 2.1.3.2 – in the first sentence, “Bottom” should be “Fly”.
13. Page 15, Section 2.1.3.4 – the fifth sentence of this paragraph states “The transfer pipes associated with the pump station inlet structure are below grade and could not be visually inspected during the assessment.” This sentence should either be removed (since the pump station inlet structure is in the Bottom Ash Pond or should be modified to clarify

that the pipes that could not be inspected are associated with the Fly Ash Pond decant structure.

14. Page 16, Section 2.4 – in the last sentence of the first paragraph, the word “And” should not be capitalized.
15. Page 19, Section 3.4 – in the first sentence of the paragraph, “Bottom” should be “Fly”.

Comments on Section 3.0 – Assessments and Recommendations

DP&L has completed some of the recommended actions based on the preliminary discussion held during the site visit and will be evaluating the assessments and recommendations included in the draft report. DP&L will provide additional information on the status of these activities upon receipt of the final report.

Comments on Appendix C

1. On the Inspection Checklist for the Bottom Ash Pond, the comment for Item #9 includes the statement “Some trees (>6-inch diameter) on southwestern downstream slope, near out fall structure.” This comment appears to be more directed toward the findings associated with the Fly Ash Pond (the same comment appears on the Inspection Checklist for the Fly Ash Pond) and should be removed from this checklist.

DP&L appreciates this opportunity to provide comments on the draft impoundment assessment report for Killen Electric Generating Station. If you have any questions please contact Mr. Mike Harrell at (937) 549-2641 extension 5733.

Sincerely,



Steve Barnoski
Asst. Plant Manager JMSS/Compliance

Cc: Frank Vetere – GZA GeoEnvironmental, Inc.
JoAnne Rau – DP&L
Mike Harrell – DP&L
Scott Arentsen – DP&L